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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9
10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 KORY ALLEN CROSSMAN,
14 Defendant.

15 Case No. 2:07-cr-145-KJD-PAL-9

16 **STIPULATION TO EXTEND**
DEADLINES IN THIS COURT'S
OCTOBER 6, 2015 ORDER BY
THIRTY (30) DAYS

17 (Third Request)

18 The United States of America, by Assistant United States Attorney Elizabeth Olson
19 White, and Defendant Kory Allen Crossman, by Assistant Federal Public Defender Nisha
Brooks-Whittington, submit the following Joint Stipulation to extend, by thirty (30) days, all of
the deadlines set in this Court's Order dated October 6, 2015. *See CR # 1485.*

20 The parties agree and stipulate to the following:

21 1. On November 26, 2008, this Court sentenced Defendant to 140 months'
imprisonment on his conviction for drug-related offenses. CR # 437.

22 2. On March 23, 2015, undersigned counsel filed a motion for appointment of
counsel pursuant to 18 U.S.C. § 3006A and Local Rule 44-1 on behalf of Mr. Crossman to
determine whether he may qualify to seek a reduction of his sentence in light of Guidelines
Amendment 782 and 18 U.S.C. § 3582(c)(2). CR # 1474.

3. On April 8, 2015, this Court issued an Order appointing the Federal Public Defender to represent Defendant, and setting deadlines. Specifically, the Court ordered the Probation Office to provide certain documents to the parties within 30 days (i.e., by May 8, 2015) and ordered the Federal Public Defender to file any appropriate motion or stipulation within 120 days (i.e., by August 6, 2015). CR # 1475.

4. On August 6, 2015, the parties filed a joint stipulation to extend the deadlines in this Court's April 8, 2015 Order by 60 days. CR 1480. On August 18, 2015, the Court granted the stipulation. CR 1482. The parties filed a second stipulation to extend the deadlines, which was granted on October 6, 2015. CR # 1484, 1485.

5. Since the last stipulation was filed, the parties have received Mr. Crossman's disciplinary hearing and progress report records. Defense counsel, however, needs additional time to review those records and file the motion for a sentence reduction.

6. For the reason stated above, the parties respectfully request that the Court issue an order extending the deadlines in the Court's October 6, 2015 Order by thirty (30) days.

DATED this 18th day of November, 2015.

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

/s Nisha Brooks-Whittington

NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

/s/ Elizabeth O. White

ELIZABETH O. WHITE
Appellate Chief and
Assistant United States Attorney

DATED: November 19, 2015

IT IS SO ORDERED


U.S. DISTRICT JUDGE
KENT J. DAWSON